

Fact Sheet Diageo USVI, Inc.

- **Jan 12, 2009** - St. Croix Renaissance Group, LLP (SCRG) notifies EPA Region 2 that SCRG is accepting a new tenant, Diageo USVI, Inc., at SCRG's industrial park. The new tenant will construct a new 80,000 PGD (proof gallons per day) Diageo USVI, Inc. Rum Production Distillery facility. All rum produced at this distillery will be stored at a new warehouse belonging to Diageo that will be located off the SCRG property. The Diageo USVI Rum Warehouse Storage Facility will be located the junction of West Airport Road and Road 64 (Melvin H. Evans Highway).
- **Jan 23, 2009** - Alliance Environmental Group, Inc, a consultant for Diageo, requests VIDPNR to issue a concurrence with their interpretation that VOC fugitive emissions from the proposed rum warehouse do not count towards the "potential to emit" from this proposed facility.
- **April 8, 2009** – VIDPNR requests guidance from EPA regarding the above issue.
- **April 23, 2009** – EPA informs VIDPNR that after reviewing the facts of this case, AP-42 technical background information and a similar determination made by EPA Region 5 in Indiana, EPA Region 2 has concluded that the ethanol emissions from the proposed Diageo off-site warehouse can be considered fugitive emissions, and as such, should not be considered in the "potential to emit" from the warehouse itself.
- **Nov 2009** – VIDPNR prepared a draft "synthetic minor source" permit for the Diageo Distillery which was reviewed by CEPD. A "synthetic minor" is a source that has equipment capable of emitting like a "major stationary" source but has permit limits that restricts the emissions to "minor source." In order for these permit limits to be valid they must be "federally enforceable." One requisite for "federal enforceability" is that the permit limits must undergo public review. VIDPNR had indicated that their minor source permit rules do not require public review. EPA advised VIDPNR to go ahead and public notice the draft permit.
- **Jan 2010** – Draft synthetic minor permit undergoing minor changes to address monitoring requirements. VIDPNR discussing the permit conditions with CEPD. The draft synthetic minor permit will undergo public review soon.